

Timothy T. Pridmore; SBN: 00788224
Todd J. Johnston; SBN: 24050837
MCWHORTER, COBB & JOHNSON, LLP
1722 Broadway (79401)
P. O. Box 2547
Lubbock, Texas 79408
806/762-0214; 806/762-8014 (fax)
Attorneys for Defendant Angie Robinson

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

RE: McCLAIN FEED YEARD, INC., McCLAIN F FARMS, INC., AND 7M CATTLE FEEDERS, INC., <i>Debtors.</i> ¹	Chapter 7 CASE NO. 23-20084-rlj Jointly Administered
RABO AGRIFINANCE LLC, <i>Plaintiff,</i> v.	ADV. PROC. NO. 23-02005-rlj Honorable Robert L. Jones
ACEY LIVESTOCK, LLC, <i>et al.</i> <i>Defendants.</i>	

¹ The Debtors in these jointly administered cases are: (1) McClain Feed Yard, Inc. (Case No. 23-20084); (2) McClain Farms, Inc. (Case No. 23-20885); and (3) 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.

DEFENDANT ANGIE ROBINSON'S ORIGINAL ANSWER

COMES NOW Defendant Angie Robinson (“**Robinson**”), by and through her attorneys of record, McWhorter, Cobb & Johnson, LLP (Todd J. Johnston and Timothy T. Pridmore), and for its Answer to Plaintiffs Rabo AgriFinance First Amended Complaint for Declaratory Relief (the “Complaint”) states as follows:

RESPONSE TO “JURISDICTION, VENUE, AND PARTIES”

1. Defendant admits the allegations contained in paragraph 1 of the Complaint.
 2. Defendant admits the allegations contained in paragraph 2 of the Complaint.
 3. Paragraph 3 of the Complaint does not express an allegation of fact or law directed against this or any other Defendant and, therefore, no response is required.
 4. Paragraph 4 of the Complaint does not express an allegation of fact or law directed against this or any other Defendant and, therefore, no response is required.
 5. Paragraph 5 of the Complaint does not express an allegation of fact or law directed against this or any other Defendant and, therefore, no response is required.
 6. Paragraph 6 of the Complaint does not express an allegation of fact or law directed against this or any other Defendant and, therefore, no response is required.
- 7-99. Robinson is without sufficient information to admit or deny the allegations of Paragraphs 7-99 of the Complaint, and therefore denies same.
100. Defendant admits the allegations contained in paragraph 100 of the Complaint.
- 101-138. Robinson is without sufficient information to admit or deny the allegations of Paragraphs 101-138 of the Complaint, and therefore denies same.
139. Defendant admits the allegations contained in paragraph 139 of the Complaint.
140. Paragraph 140 of the Complaint does not express an allegation of fact or law directed against this or any other Defendant and, therefore, no response is required.

RESPONSE TO “GENERAL ALLEGATIONS”

141. Robinson is without sufficient information to admit or deny the allegations of Paragraph 141 of the Complaint, and therefore denies same.

142. Robinson is without sufficient information to admit or deny the allegations of Paragraph 142 of the Complaint, and therefore denies same.

143. Robinson is without sufficient information to admit or deny the allegations of Paragraph 143 of the Complaint, and therefore denies same.

144. Robinson is without sufficient information to admit or deny the allegations of Paragraph 144 of the Complaint, and therefore denies same.

145. Robinson is without sufficient information to admit or deny the allegations of Paragraph 145 of the Complaint, and therefore denies same.

146. Robinson is without sufficient information to admit or deny the allegations of Paragraph 146 of the Complaint, and therefore denies same.

147. Robinson is without sufficient information to admit or deny the allegations of Paragraph 147 of the Complaint, and therefore denies same.

148. Robinson is without sufficient information to admit or deny the allegations of Paragraph 148 of the Complaint, and therefore denies same.

149. Robinson is without sufficient information to admit or deny the allegations of Paragraph 149 of the Complaint, and therefore denies same.

150. Robinson is without sufficient information to admit or deny the allegations of Paragraph 150 of the Complaint, and therefore denies same.

151. Robinson is without sufficient information to admit or deny the allegations of Paragraph 151 of the Complaint, and therefore denies same.

152. Robinson is without sufficient information to admit or deny the allegations of Paragraph 152 of the Complaint, and therefore denies same.

153. Robinson is without sufficient information to admit or deny the allegations of Paragraph 153 of the Complaint, and therefore denies same.

154. Robinson is without sufficient information to admit or deny the allegations of Paragraph 154 of the Complaint, and therefore denies same.

155. Robinson is without sufficient information to admit or deny the allegations of Paragraph 155 of the Complaint, and therefore denies same.

156. Robinson is without sufficient information to admit or deny the allegations of Paragraph 156 of the Complaint, and therefore denies same.

157. Robinson is without sufficient information to admit or deny the allegations of Paragraph 157 of the Complaint, and therefore denies same.

158. Robinson is without sufficient information to admit or deny the allegations of Paragraph 158 of the Complaint, and therefore denies same.

159. Robinson is without sufficient information to admit or deny the allegations of Paragraph 159 of the Complaint, and therefore denies same.

160. Robinson is without sufficient information to admit or deny the allegations of Paragraph 160 of the Complaint, and therefore denies same.

161. Robinson is without sufficient information to admit or deny the allegations of Paragraph 161 of the Complaint, and therefore denies same.

162. Robinson is without sufficient information to admit or deny the allegations of Paragraph 162 of the Complaint, and therefore denies same.

163. Robinson is without sufficient information to admit or deny the allegations of Paragraph 163 of the Complaint, and therefore denies same.

164. Robinson is without sufficient information to admit or deny the allegations of Paragraph 164 of the Complaint, and therefore denies same.

165. Robinson is without sufficient information to admit or deny the allegations of Paragraph 165 of the Complaint, and therefore denies same.

166. Robinson is without sufficient information to admit or deny the allegations of Paragraph 166 of the Complaint, and therefore denies same.

167. Robinson is without sufficient information to admit or deny the allegations of Paragraph 167 of the Complaint, and therefore denies same.

168. Robinson is without sufficient information to admit or deny the allegations of Paragraph 168 of the Complaint, and therefore denies same.

169. Robinson is without sufficient information to admit or deny the allegations of Paragraph 169 of the Complaint, and therefore denies same.

170. Robinson is without sufficient information to admit or deny the allegations of Paragraph 170 of the Complaint, and therefore denies same.

171. Robinson is without sufficient information to admit or deny the allegations of Paragraph 171 of the Complaint, and therefore denies same.

172. Robinson is without sufficient information to admit or deny the allegations of Paragraph 172 of the Complaint, and therefore denies same.

173. Robinson is without sufficient information to admit or deny the allegations of Paragraph 173 of the Complaint, and therefore denies same.

**RESPONSE TO “FIRST CAUSE OF ACTION
(Declaratory Judgment)”**

174. Robinson is without sufficient information to admit or deny the allegations of Paragraph 174 of the Complaint, and therefore denies same.

175. Robinson is without sufficient information to admit or deny the allegations of Paragraph 175 of the Complaint, and therefore denies same.

176. Robinson is without sufficient information to admit or deny the allegations of Paragraph 176 of the Complaint, and therefore denies same.

177. Robinson is without sufficient information to admit or deny the allegations of Paragraph 177 of the Complaint, and therefore denies same.

178. Robinson is without sufficient information to admit or deny the allegations of Paragraph 178 of the Complaint, and therefore denies same.

179. Robinson is without sufficient information to admit or deny the allegations of Paragraph 179 of the Complaint, and therefore denies same.

180. Robinson is without sufficient information to admit or deny the allegations of Paragraph 180 of the Complaint, and therefore denies same.

181. Robinson is without sufficient information to admit or deny the allegations of Paragraph 181 of the Complaint, and therefore denies same.

182. Robinson is without sufficient information to admit or deny the allegations of Paragraph 182 of the Complaint, and therefore denies same.

183. Robinson is without sufficient information to admit or deny the allegations of Paragraph 183 of the Complaint, and therefore denies same.

184. Robinson is without sufficient information to admit or deny the allegations of Paragraph 184 of the Complaint, and therefore denies same.

**RESPONSE TO “SECOND CAUSE OF ACTION
(Declaratory Judgment)”**

185. Robinson is without sufficient information to admit or deny the allegations of Paragraph 185 of the Complaint, and therefore denies same.

186. Robinson is without sufficient information to admit or deny the allegations of Paragraph 186 of the Complaint, and therefore denies same.

187. Robinson is without sufficient information to admit or deny the allegations of Paragraph 187 of the Complaint, and therefore denies same.

188. Robinson is without sufficient information to admit or deny the allegations of Paragraph 188 of the Complaint, and therefore denies same.

189. Robinson is without sufficient information to admit or deny the allegations of Paragraph 189 of the Complaint, and therefore denies same.

190. Robinson is without sufficient information to admit or deny the allegations of Paragraph 190 of the Complaint, and therefore denies same.

191. Robinson is without sufficient information to admit or deny the allegations of Paragraph 191 of the Complaint, and therefore denies same.

192. Robinson is without sufficient information to admit or deny the allegations of Paragraph 192 of the Complaint, and therefore denies same.

193. Robinson is without sufficient information to admit or deny the allegations of Paragraph 193 of the Complaint, and therefore denies same.

194. Robinson is without sufficient information to admit or deny the allegations of Paragraph 194 of the Complaint, and therefore denies same.

195. Robinson is without sufficient information to admit or deny the allegations of Paragraph 195 of the Complaint, and therefore denies same.

196. Robinson is without sufficient information to admit or deny the allegations of Paragraph 196 of the Complaint, and therefore denies same.

197. Robinson is without sufficient information to admit or deny the allegations of Paragraph 197 of the Complaint, and therefore denies same.

198. Robinson is without sufficient information to admit or deny the allegations of Paragraph 198 of the Complaint, and therefore denies same.

199. Robinson is without sufficient information to admit or deny the allegations of Paragraph 199 of the Complaint, and therefore denies same.

200. Robinson is without sufficient information to admit or deny the allegations of Paragraph 200 of the Complaint, and therefore denies same.

201. Robinson is without sufficient information to admit or deny the allegations of Paragraph 201 of the Complaint, and therefore denies same.

202. Robinson is without sufficient information to admit or deny the allegations of Paragraph 202 of the Complaint, and therefore denies same.

**RESPONSE TO “THIRD CAUSE OF ACTION
(Declaratory Judgment)”**

203. Robinson is without sufficient information to admit or deny the allegations of Paragraph 203 of the Complaint, and therefore denies same.

204. Robinson is without sufficient information to admit or deny the allegations of Paragraph 204 of the Complaint, and therefore denies same.

205. Robinson is without sufficient information to admit or deny the allegations of Paragraph 205 of the Complaint, and therefore denies same.

206. Robinson is without sufficient information to admit or deny the allegations of Paragraph 206 of the Complaint, and therefore denies same.

207. Robinson is without sufficient information to admit or deny the allegations of Paragraph 207 of the Complaint, and therefore denies same.

208. Robinson is without sufficient information to admit or deny the allegations of Paragraph 208 of the Complaint, and therefore denies same.

209. Robinson is without sufficient information to admit or deny the allegations of Paragraph 209 of the Complaint, and therefore denies same.

210. Robinson is without sufficient information to admit or deny the allegations of Paragraph 210 of the Complaint, and therefore denies same.

211. Robinson is without sufficient information to admit or deny the allegations of Paragraph 211 of the Complaint, and therefore denies same.

212. Robinson is without sufficient information to admit or deny the allegations of Paragraph 212 of the Complaint, and therefore denies same.

RESPONSE TO “PRAYER FOR RELIEF”

The “Prayer for Relief” of the Complaint does not appear to state a claim against this Defendant requiring any response. However, in the event that there are allegations made against this Defendant, such allegations are denied.

Dated: January 5, 2024

Respectfully submitted

MCWHORTER, COBB & JOHNSON, L.L.P.
1722 Broadway
P.O. Box 2547
Lubbock, Texas 79408
(806) 762-0214 - Telephone
(806) 762-8014 – Facsimile

Timothy T. Pridmore

SBN: 00788224
tpridmore@mcjllp.com
Todd J. Johnston
SBN: 24050837
tjohnston@mcjllp.com

By: /s/ Todd J. Johnston
Todd J. Johnston

ATTORNEYS FOR DEFENDANT
ANGIE ROBINSON